solution of a second salt at a final density[, said precursor polymer dispersion] produces a final polymer dispersion comprising a second concentration comprising final particles of said water-soluble polymer at a final level of hydration, said second concentration and said final level of hydration being effective at downhole conditions to maintain an effective level of a property of said final brine selected from the group consisting of rheology, fluid loss control, and a combination thereof.

E1 cont

3. (Once amended) The method of claim 1 wherein said sufficient concentration is [between] from about 1[-] lb to about 2 lb of said water-soluble polymer per gallon of said precursor brine.

E2

26. (Three times amended) A precursor polymer dispersion comprising:

an aqueous solution of a first salt at a first density, said first salt comprising cations consisting essentially of cations of one or more multivalent alkaline earth metals; and

a first concentration of particles of a water-soluble polymer at a level of prehydration;

wherein, ~~even absent other solvating agents~~, [upon] addition of a sufficient quantity of said precursor polymer dispersion to a final brine comprising an aqueous solution of a second salt at a final density[, said precursor polymer dispersion] produces a final polymer dispersion comprising a second concentration comprising final particles of said water-soluble polymer at a final level of hydration, said second concentration and said final level of hydration being effective at downhole conditions to maintain an effective level of a property of said final brine selected from the group consisting of rheology, fluid loss control, and a combination thereof.

1

E3

42. (Three times amended) A method for producing a brine for use in drilling and completion operations comprising:

providing a precursor brine comprising an aqueous solution of a first salt at a first density, said first salt comprising cations consisting essentially of cations of one or more multivalent alkaline earth metals; and

mixing a water-soluble polymer with said precursor brine at a first concentration and under first conditions, wherein said first density, said first concentration, and said first conditions are effective to produce a precursor polymer dispersion comprising particles of said water-soluble polymer at a level of prehydration;

wherein, ~~even absent other solvating agents~~, [upon] addition of a sufficient quantity of said precursor polymer dispersion to a final brine comprising an aqueous solution of a second salt at a final density[, said precursor polymer dispersion] produces a final polymer dispersion comprising a second concentration comprising final particles of said water-soluble polymer at a final level of hydration, said second concentration and said final level of hydration being effective at downhole conditions to maintain an effective level of a property of said final brine selected from the group consisting of rheology, fluid loss control, and a combination thereof; and

mixing said sufficient quantity of said precursor polymer dispersion with said final brine.

57. (Three times amended) A precursor polymer dispersion comprising:

a precursor brine comprising an aqueous solution of a first salt at first density, said first salt comprising cations consisting essentially of cations of one or more multivalent alkaline earth metals;

a precursor polymer dispersion in said precursor brine comprising a first concentration of particles of a water-soluble polymer at a level of prehydration;

wherein, ~~even absent other solvating agents,~~ [upon] mixing of a sufficient quantity of said precursor polymer dispersion with a final brine comprising an aqueous solution of a second salt at a final density[, said precursor polymer dispersion] produces a second concentration of final particles of said water-soluble polymer at a final level of hydration, said second concentration and said final level of hydration being effective at downhole conditions to maintain an effective level of a property of said final brine selected from the group consisting of rheology, fluid loss control, and a combination thereof.

REMARKS

Obviousness Rejections

The examiner rejects claims 1-3, 7, 9, 14-16, 21-23, 27, and 29-65 as obvious over DD v. Mondshine v. House.

Response

The examiner has not established a case of *prima facie* obviousness of the claims because the examiner has not pointed to a teaching or suggestion that it is **critical** to use multivalent salts of alkaline earth metals to form a precursor polymer dispersion in order for that dispersion to achieve the claimed results.